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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

MARIVELLE NUNEZ AS TRUSTEE FOR
MARIVELLE NUNEZ REVOCABLE
LIVING TRUST,

Plaintiff,

v.

HOMEFIELD FINANCIAL, INC.;
MORTGAGE ELECTRONIC
REGISTRATION SYSTEMS, INC.;
NATIONSTAR MORTGAGE, LLC;
KEYBANK NATIONAL ASSOCIATION; and
DOES 1 through 10, inclusive; ROE
CORPORATIONS 1 through 10, inclusive

Defendants.

CASE NO. 2:16-cv-01504-JAD-NJK

**STIPULATION AND ORDER TO
EXTEND RESPONSE DEADLINE TO
NATIONSTAR MORTGAGE, LLC's
MOTION FOR SUMMARY
JUDGMENT [ECF NO. 42]**

[FIRST REQUEST]

NATIONSTAR MORTGAGE, LLC

Counterclaimant/Crossclaimant,

v.

MARIVELLE NUNEZ AS TRUSTEE FOR
MARIVELLE NUNEZ REVOCABLE
LIVING TRUST; SILVER TURTLE
HOMEOWNER'S ASSOCIATION; and
NEVADA ASSOCIATION SERVICES

Counter-Defendant/Cross-Defendants

Defendant/Counterclaimant/Cross-Claimant Nationstar Mortgage LLC (**Nationstar**) and
Defendant Mortgage Electronic Registration Systems, Inc. (**MERS**, collectively **Defendants**) and
Plaintiff/Counter-Defendant Marivelle Nunez as Trustee for Marivelle Nunez Revocable Living

1 Trust (**Plaintiff**), by and through their respective counsel of record, stipulate to extend Plaintiff's
2 deadline to respond to Defendant Nationstar Mortgage LLC's motion for summary judgment
3 [ECF 42] for fourteen (14) days as follows:

4 1. Plaintiff filed its complaint in the Eighth Judicial District Court of Clark County,
5 Nevada on May 4, 2016 asserting quiet title/declaratory relief and injunction relief against
6 Defendants.

7 2. Nationstar removed this action to the United States District Court, District of
8 Nevada on June 24, 2016 [ECF No. 1].

9 3. MERS & Nationstar answered Plaintiff's complaint on July 15, 2016 [ECF No. 4
10 & 6].

11 4. This Court entered a discovery plan and scheduling order on May 23, 2019, setting
12 a November 19, 2019 dispositive motions deadline [ECF No. 27]. An order granting the parties'
13 stipulation for an extension of the November 19, 2019 deadline was entered on September 23,
14 2019, extending the dispositive motions deadline to February 3, 2020 [ECF No. 40].

15 5. The parties stipulate to extending the Plaintiff's deadline to Nationstar Mortgage
16 LLC's motion for summary judgment [ECF 42] for fourteen (14) days, up to and including **March**
17 **9, 2020**, to allow time for the parties to continue settlement negotiations which, if finalized, will
18 resolve all pending claims.

19 6. The parties are currently evaluating a settlement arrangement that is atypical of
20 these types of cases, as the original homeowner purchased the property from the HOA foreclosure
21 sale buyer and is plaintiff in this action against the loan servicer, Nationstar, thus necessitating
22 considerations between a borrower and lender not at issue in other cases.

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